

1 Amy H. Rubin
2 Federal Defenders of Eastern Washington and Idaho
3 10 N Post Suite 700
4 Spokane, Washington 99201
5 (509) 624-7606

6 Attorneys for the Defendant

7 UNITED STATES DISTRICT COURT
8 EASTERN DISTRICT OF WASHINGTON

9 United States of America,

10 Plaintiff,

11 v.

12 Felipe Tapia-Perez,

13 Defendant.

No. 2:21-cr-00047-WFN-1

Sentencing Recommendation

24 Sentencing Recommendation

1 February 27, 2021 is a day and a moment in time that Felipe Tapia-Perez will live
2 with for the rest of his life. He will never forget what happened on this day whether he is
3 in custody or out. It is a moment that he would give anything, including his own life, to
4 change. It was the day that his son, Jeremiah, was shot and killed. There is no greater
5 loss or tragedy – a circumstance that no parent should ever face.
6

7 The parties spent a great deal of time negotiating this case. The recommendation
8 the parties are proposing came with a lot of discussion and thought. This agreement was
9 not solely between the federal government and Mr. Tapia-Perez. Many conversations
10 were had with the parties in Adams County as well as Tapia-Perez's family.
11

12 A recommendation of 168 months in this case is significant, but reasonable under
13 the circumstances of the situation. It takes into account the two federal charges –
14 Possession of a Stolen Firearm and Alien in Possession of a Firearm – while also
15 accounting for the death of Mr. Tapia-Perez's son.
16

17 Mr. Tapia-Perez has been in custody since February 27, 2021. To date, he has
18 been in custody for approximately 27 months without incident. A sentence of 14 years is
19 significant. As this Court is aware, Mr. Tapia-Perez will do his entire sentence with only
20 a reduction for good time and time served because he has no status in the United States.
21 After serving the next decade in prison, Mr. Tapia-Perez will be deported to Mexico
22 where he will have to remain for the rest of his life.
23

24 The parties respectfully request the Court follow the recommendation of the
parties and sentence Mr. Tapia-Perez to 168 months with credit for the time he came into
Sentencing Recommendation

1 custody on February 27, 2021. This sentence is reasonable but not greater than necessary
2 to achieve the sentencing goals.
3
4
5

6 Dated: April 21, 2023

7 Respectfully Submitted,

8 S/Amy H. Rubin

9 Amy H. Rubin, GA 618349

10 Attorneys for Mr. Tapia-Perez

11 Federal Defenders of

12 Eastern Washington and Idaho

13 10 N Post Suite 700

14 Spokane, Washington 99201

15 (509) 624-7606

16 (509) 747-3539

17 Email: Amy_Rubin@fd.org
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CERTIFICATE OF SERVICE

I hereby certify that on April 21, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: Michael J. Ellis, Assistant United States Attorney.

S/Amy H. Rubin

Amy H. Rubin, GA 618349

Attorneys for Mr. Tapia-Perez

Federal Defenders of

Eastern Washington and Idaho

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Spokane, Washington 99201

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(509) 747-3539

Email: Amy_Rubin@fd.org